

UNITED STATES DISTRICT COURT
 for the
 Southern District of Indiana

United States of America)
 v.)
)
) Case No.
) 1:22-mj-0332
)
 Erik Hanson)
)

 Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 1, 2022 to April 22, 2022 in the county of Hamilton in the
Southern District of Indiana, the defendant(s) violated:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------------|---|
| 18 U.S.C. 21 § 2252(a)(2) | Distribution/Receipt of Child Pornography |

This criminal complaint is based on these facts:

See attached Affidavit.

Continued on the attached sheet.

s/Michael Johnson

Complainant's signature

Michael Johnson, Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephonic communication (*reliable electronic means*)

Date: 4/23/2022

City and state: Indianapolis, Indiana



AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Michael Johnson, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. **Affiant:** I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (“HSI”). I am currently assigned to the Office of the Resident Agent in Charge, Indianapolis, Indiana. I have been employed as a Special Agent with HSI since February of 2006. Before being appointed as a Special Agent with HSI, I was a Police Officer for the City of Indianapolis for approximately eleven years. The last four years, I was assigned to a federal task force. During my experience with both agencies, I have been involved in numerous investigations, including those involving production, advertising, distribution and possession of child pornography. I have had training through the Federal Law Enforcement Training Center, HSI, Office of Juvenile Justice Prevention, the United States Attorney’s Office, and Project Safe Childhood in investigating computer related crimes and child exploitation. Since being employed with HSI, I have periodically been temporarily assigned to HSI’s Cyber Crimes Center (C3). During that assignment, I worked on active undercover cyber investigations as well as the cataloging and categorizing of over one-million images and videos of child pornography. I have been involved in over five-hundred investigations involving the sexual exploitation of children.

2. **Probable Cause:** For the reasons listed below, there is probable cause to believe that **Erik Hanson (hereinafter “Hanson”)** with a DOB of XX-XX-1992 (known to affiant, but redacted) has committed the following offenses in the Southern District of Indiana and elsewhere: **Distribution and Receipt of Visual Depictions of a Minor Engaged in Sexually Explicit Conduct (18 U.S.C. § 2252(a)(2))**. This investigation concerns alleged violations of 18 U.S.C. § 2252 (a)(2), which prohibits a person from knowingly receiving and distributing any visual depiction of minors engaging in sexually explicit conduct when such visual depiction was either mailed or shipped or transported in interstate or foreign commerce by any means, including by computer, or when such visual depiction was produced using materials that had traveled in interstate or foreign commerce.

3. **Definitions:** The following definitions apply to this Affidavit:

a. The term “minor,” as defined in 18 U.S.C. § 2256(1), refers to any person under the age of eighteen years.

b. The term “sexually explicit conduct,” 18 U.S.C. § 2256(2)(A)(i-v), is defined as actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic areas of any person.

c. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on

computer disc or other electronic means which is capable of conversion into a visual image, and data which is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

d. The term “computer,” as defined in 18 U.S.C. §1030(e)(1), means an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical, arithmetic, or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device.

4. **Investigation of Erik Hanson:** On April 6, 2022, Detective Tyler Mitchell of the Westfield, Indiana Police Department assigned to the Hamilton County Metro Child Exploitation Task Force (HCMCETF) received a case file from the Federal Bureau of Investigation (FBI) pertaining to a Westfield, IN resident attempting to solicit sex with a person the suspect believed to be a 14-year-old child. The 14-year-old “child” and her “father” were undercover personas of a law enforcement officer (**User Account 1**), who was conducting an investigation within at least one chatroom on the Kik Messenger application.

a. The suspect, later identified as Erik Hanson (hereinafter “**Hanson**”), used the Kik application under a username (hereinafter “**Suspect Account 1**”) known to Your Affiant.

b. The user of **Suspect Account 1** identified himself as “**Suspect Account 1**”, and in the chat with the undercover officer (UC), “**Suspect Account 1**” said that he lived near Indianapolis, Indiana.

c. Hanson later sent a photo of his face that matched Hanson’s Indiana Bureau of Motor Vehicles photo and publicly accessible social media photos.

d. On February 7, 2022, the user of **Suspect Account 1** sent **User Account 1** (the UC) a message asking about **User Account 1**’s 14-year-old daughter. The user of **Suspect Account 1** then sent photos of his penis next to printed images of female children with ejaculate on the pictures. The user of **Suspect Account 1** referred to these images as “tributes” and told **User Account 1** that the user of **Suspect Account 1** has produced these tributes for other dads that use the Kik application. The user of **Suspect Account 1** asked if **User Account 1** would like a tribute made with **User Account 1**’s daughter’s photo.

e. **Suspect Account 1** said that 14-year-old girls were his “favorite age” for his sexual interests. **Suspect Account 1** then said that he wanted to have sex with **User Account 1**’s daughter. **Suspect Account 1** was given **User Account 1**’s child’s phone number to that **Suspect Account 1** could correspond with the “child” by text message.

f. **Suspect Account 1** suggested to the UC that **Suspect Account 1** and the UC meet in Nashville, Tennessee so that **Suspect Account 1** could have sexual contact with the 14-year-old daughter and

Suspect Account 1 would let the UC watch **Suspect Account 1** have sex with the UC's daughter.

g. On February 18, 2022, **Suspect Account 1** started communicating directly with who he believed to be a 14-year-old girl.

i. **Suspect Account 1** told that "14 doesn't bother me" and he offered to drive to her location or to meet in Nashville, TN.

ii. **Suspect Account 1** then sent a photo of his face that looks like the BMV photo of **Hanson**.

iii. On February 20, 2022, **Suspect Account 1** asked the UC's "daughter" if she would like to "sext" with him. **Suspect Account 1** requested for a picture of her to be completely nude, except wearing sneakers.

iv. **Suspect Account 1** then sent a photo of his erect penis to the "daughter." **Suspect Account 1** then requested a photo of her breasts. **Suspect Account 1** sent another photo of his erect penis to her. **Suspect Account 1** then said he wanted to have sex with her in the "doggy style" position and to "suck on your young tits, have you ride my hard cock" and that he wanted to have sex with her while she was wearing shoes and nothing else.

v. **Suspect Account 1** was reminded that the “daughter” was 14 years old, and he said that it doesn’t scare him, and it turns him on more.

5. On April 8, 2022, Det. Mitchell applied for a search warrant of the **Suspect Account 1** Kik account.

6. **Kik Search Warrant Return:** Det. Mitchell received data from Kik in response to the search warrant he obtained. On April 18, 2022, Det. Mitchell found that **Suspect Account 1** used the email address erikhanson3@yahoo.com and the most recent IP address (208.38.246.26; Port 18240) activity was on April 11, 2002 at 21:34:08UTC. This IP address geolocated to Westfield, IN to a MetroNet subscriber. In reviewing the **Suspect Account 1** Kik data, Detective Mitchell located 91 photos and videos of child sexual abuse material including infants, child bondage and child bestiality. Below is a description of some of the videos found:

a. **File 1 12fa3ffb-8ca4-457a-a277-aa7042ef9e61:** This is a 1 minute and 56-second-long video of a nude female infant being ejaculated on by an adult male. The video starts with the text “*What a filthy, dirty little fucking slut! ‘Should it be a surprise, that such sexually enticing whores get raped?’ The dirty little sluts are asking for it!*” over a pink background. The video also depicts attempts by an adult male to vaginally penetrate the infant, digital penetration of the vagina, and

lascivious display of the child's genitals. I would estimate the infant's age to be less than 1 year old.

b. **File 2 04b7d1a7-0b58-4a02-a576-baccd964d535:** This is a :55-second-long video of an infant child with an adult male penis in the infant's mouth. The infant is crying. I would estimate the infant's age to be less than 1 year old.

c. **File 3 0c3d59ee-2e22-4c36-8eb6-662b835fbfc0:** This is a :48-second-long video of a prepubescent female engaged in an act of bestiality with a dog. The child's breasts and genitals are uncovered. I would estimate the child to be between 7 and 9 years old.

d. **File 4 3a834387-8096-402c-8f79-fd612986050e:** This is a 1:03 long video of a pubescent female child engaged in an act of bestiality with a dog. The child's breasts are visible at the end of the video. I would estimate her age to be between 12 and 15 years old.

e. **File 5 0d9b95fe-caad-4c65-a22f-fce848d7a32d:** This is a 1 minute and 59-second-long video of a prepubescent female child tied up while being vaginally and anally penetrated by an adult male's penis and also digitally penetrated. I would estimate her age to be between 6 to 8 years old.

f. **File 9 1b0c6fc8-0cd2-4992-87d9-07e57b763bff:** This is a :38-second-long video of a prepubescent female child being vaginally penetrated by an adult male penis. I would estimate her age to be between 7 and 10 years old.

g. **File 11 0b51336f-bea8-427c-9e91-818e75cea0b4:** This is a 1 minute and 42-second-long video of an adult female with her mouth on a prepubescent male child's penis. I would estimate the child's age to be between 2 and 4 years old.

7. On April 18, 2022, a subpoena was served to MetroNet for the subscriber information of IP 208.38.246.26; Port 18240. On April 19, 2022, MetroNet responded that Erik Hanson at 160XX Coleman Drive in Westfield, IN was the customer associated with that IP address.

8. **Encounter with Erik Hanson:** On April 22, 2022, a search warrant for Hanson's house and person was served. Hanson was advised of his rights verbally and through an advice of rights form. Hanson agreed to waive those rights and speak with law enforcement officers. Your Affiant and Det. Mitchell interviewed Hanson. Hanson's interview was audio and video recorded, and he made the following statements:

a. Hanson stated that he was the owner of the Kik account ShXXXXver3 and ShXXXXver13 (both redacted but known to Your Affiant), and he has used Kik since 2014 or 2015 for the purpose of viewing child pornography. The last time he used his Kik account was on 4/21/2022.

b. Hanson said that he viewed child pornography for the first time when he was in 7th or 8th grade.

c. Hanson said that he belongs to many groups on Kik and most of them are groups made for exchanging child pornography.

d. Hanson said that he primarily chats with two Kik users

Suspect Account 2 and **Suspect Account 3** (account names redacted but known to law enforcement).

i. Hanson said that over the last 3 months, he has paid

Suspect Account 2 \$75 using CashApp for **Suspect Account 2** to produce child pornography for Hanson, using **Suspect Account 2's** 10- to 11-year-old daughter as the victim.

ii. Hanson said that he paid and requested **Suspect Account 2** to have **Suspect Account 2's** daughter perform oral sex on **Suspect Account 2** in a video and another video of intercourse. Hanson said he also requested a video of **Suspect Account 2's** daughter wearing shoes during the sex acts.

iii. Hanson said **Suspect Account 2** told Hanson he lived in the UK, but Hanson had doubts about his real location.

iv. Hanson shared some of these videos, produced by **Suspect Account 2**, with user **Suspect Account 3**.

v. These videos were found on Hanson's phone and are described below:

- **File 12: IMG_5163.MP4:** This is a :07-second-long video of an adult male penis rubbing his penis on a prepubescent child's buttocks and genitals. I would estimate the child's age to be between 6 and 9 years old.

- **File 13: IMG_5164.MP4:** This is a :11-second-long video of a prepubescent child's underwear being pulled down by an adult male. The adult then rubs the child's buttocks. The underwear on the child is the same as in File 12. I would estimate the child's age to be between 6 and 9 years old.
- **File 14: IMG_5165.MP4:** This is a :08-second-long video of a prepubescent child's buttocks still wearing underwear with her pants pulled down around her legs. The child's body is being rubbed by an adult male's hand. The underwear on the child is the same as in File 12 and 13. I would estimate the child's age to be between 6 and 9 years old.
- **File 15: IMG_5168.MP4:** This is a :09-second-long video of a prepubescent child sucking on an adult male's penis. I would estimate the child's age to be between 6 and 9 years old.
- **File 16: IMG_5169.MP4:** This is a :09-second-long video of a prepubescent child sucking on an adult male's penis. This appears to be the same child as File 15. I would estimate the child's age to be between 6 and 9 years old.

e. Hanson also said that he told others on Kik that he looked forward to the birth of his daughter (end of May 2022) for bath time and Hanson made promises to the other users that he would have sexual contact with his newborn daughter.

f. Hanson said that he also video recorded a younger female relative while she was in the bathroom, but he did not know what year that occurred in (relationship known to Affiant). Hanson said that when the younger female relative was 10 to 11 years old, he also played "truth or dare" games with her in order to see her naked.

9. **Evidence Recovery:** During the search of Hanson's house, officers recovered multiple digital devices, including at least 1 that Hanson told officers contained visual depictions of minors engaged in sexually explicit conduct. Officers also recovered eight (8) white Keds shoes that Hanson would wear/masturbate on while viewing child pornography.

10. **Venue:** Hanson's residence is within the Southern District of Indiana, and he received, distributed, and transported visual depictions of minors engaged in sexually explicit conduct in the Southern District of Indiana and elsewhere.

11. **Interstate Commerce:** The Kik Messenger application is an internet-based application. The Internet is a means and facility of interstate and foreign commerce. Kik is headquartered in California.

12. **Conclusion** Based upon the contents of this Affidavit, there is probable cause to believe that **Erik Hanson** has committed the above listed offense. I respectfully request that the Court issue a Criminal Complaint and Arrest Warrant for **Erik Hanson** charging him with the offense listed above.

Further affiant sayeth naught.

/s/ Michael Johnson
Michael David Johnson, Special Agent
Homeland Security Investigations

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by telephonic communication.

Date: 4/23/2022

